

Katten

KattenMuchinRosenman LLP

525 W. Monroe Street
Chicago, IL 60661-3693
312.902.5200 tel
www.kattenlaw.com

JONATHAN L. MARKS
jonathan.marks@kattenlaw.com
312.902.5337 direct
312.577.1061 fax

January 19, 2021

VIA ELECTRONIC FILING

Hon. I. Leo Glasser
United States District Court
225 Cadman Plaza East
Courtroom N504, Chambers Room N503
Brooklyn, NY 11201

Re: *State Farm v. Parisien, et al.*, No. 1:18-cv-00289-ILG-ST – Motion to Lift Stay

Dear Judge Glasser:

As this Court is aware based on the parties' stipulations and the Court's Orders of Dismissal, this action has been resolved as to all but one defendant – Quality Custom Medical Supply, Inc. ("Quality Custom"). See Dkt. 255, 9/4/2020 Stipulation and Order Dismissing Parties¹; Dkt. 265, 12/2/2020 Stipulation and Order of Dismissal as to N. Blackman. Despite the best efforts of Plaintiffs State Farm Mutual Automobile Insurance Company and State Farm Fire and Casualty Company (collectively, the "State Farm Entities") to reach a resolution with this one remaining defendant, they have been unable to do so.

Accordingly, the State Farm Entities have no choice but to respectfully move that the current stay period for discovery and motion practice be lifted and for discovery to resume between the State Farm Entities and defendant Quality Custom.

The State Farm Entities propose a telephone status conference be scheduled with Magistrate Judge Tiscione ninety (90) days after the stay is lifted.

The State Farm Entities would also be agreeable to a Court ordered settlement conference with either the Court or Magistrate Judge Tiscione at which the parties would be required to participate.

Respectfully submitted,

/s/ Jonathan L. Marks

Jonathan L. Marks

¹ The 9/4/2020 Order (Dkt. 255) dismissed Plaintiffs' claims as to Allay Medical Services, P.C., Allan L. Buslon, Charles Deng Acupuncture, P.C., Charles Deng, L.A.C., Darren Mollo D.C., P.C., Darren Mollo, D.C., David Mariano, P.T., Energy Chiropractic, P.C., FJL Medical Services P.C., Frances Lacina, D.O., Island Life Chiropractic Pain Care, PLLC, JFL Medical Care P.C., JPF Medical Services, P.C., KP Medical Care P.C., Ksenia Pavlova, D.O., Luqman Dabiri, M.D., MSB Physical Therapy P.C., Madison Products of USA, Inc., Maiga Products Corporation, Maria Masiglia, Maria Masiglia, PFJ Medical Care P.C., Francois Jules Parisien, M.D., Personal Home Care Products Corp., Quality Health Supply Corp., RA Medical Services P.C., Oleg Rybak, Tatiana Rybak, Tatiana M. Rybak, AB Quality Health Supply Corp. and ACH Chiropractic, P.C.